

Facility ID: 1677050168 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit K001](#)
- [Go to Part II for Emissions Unit K002](#)
- [Go to Part II for Emissions Unit K003](#)
- [Go to Part II for Emissions Unit K004](#)

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Facility ID: 1677050168 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint spray booth #1	OAC rule 3745-31-05 (PTI 16-1740)	no visible emissions from building ventilation  1% opacity as a 6-minute average  10.2 lbs/hr of volatile organic compounds (VOC) [facility-wide emissions]  9.9 TPY of VOC [facility-wide emissions]  See A.2.a below.
	OAC rule 3745-17-07	0.551 lb/hr of particulate matter 2.41 TPY of particulate matter
	OAC rule 3745-17-11	See A.2.b below.
	OAC rule 3745-21-09(U)	

**2. Additional Terms and Conditions**

- (a) The visible particulate emissions limit based on OAC rule 3745-17-07 is less stringent than the visible particulate emissions limit established pursuant to OAC rule 3745-31-05. This emissions unit shall only be operated to repaint (refinish) used motor vehicles and trailers. The maximum annual VOC emissions from the facility shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

. Maximum Allowable  
. Facility-wide Cumulative  
Month(s) Emissions of VOC (Tons)

- 1 0.825
- 1-2 1.650
- 1-3 2.475
- 1-4 3.300
- 1-5 4.125
- 1-6 4.950
- 1-7 5.775
- 1-8 6.600
- 1-9 7.425
- 1-10 8.250

1-11 9.075

1-12 9.900

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

The permittee shall monitor monthly, facility-wide VOC emissions via monthly invoice records of all coating-components (i.e., resins, toners, reducers, hardeners, etc.), fillers, pre-paint prepping cleaners, and all other VOC-containing solvents/materials employed facility-wide (i.e., all above monthly invoiced materials are consumed each month).

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain the following monthly, facility-wide (except where noted) records based on monthly, facility-wide invoice records:
  - a. the name and identification number of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed;
  - b. the VOC content of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed, in pounds of VOC per gallon of coating-component, filler, pre-paint cleaner, or any other VOC-containing solvent/material (manufacturer formulation data may be used, provided the VOC contents of all the above facility-invoiced materials have been determined, since January 1, 1991, in accordance with USEPA Method 24, 40 CFR Part 60, Appendix A, or similar approved test method);
  - c. the solids content of each solids-containing coating-component employed, in pounds of solids per gallon of coating-component (manufacturer formulation data may be used);
  - d. the number of gallons of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material;
  - e. the total VOC emissions contributed from all coating-components, fillers, pre-paint cleaners, and all other VOC-containing solvents/materials employed, in lbs/month (this value is calculated as follows: sum the multiplication products of the VOC content, in lbs/gal, times the monthly invoiced quantity, in gals/month, of each and every respective coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed);
  - f. the total particulate emissions contributed from all solids-containing coating-components employed, in lbs/month (this value is calculated as follows: sum the multiplication products of the solids content, in lbs/gal, times the monthly invoiced quantity, in gals/month, of each and every solids-containing coating-component employed and multiply this sum by 0.25, which is the solids transfer loss factor (solids not deposited on coating surface) for an HVLP application method (from STAPPA ALAPCO, 5/30/91); multiply this result by 0.1, which is the assumed overall particulates loss factor (particulates not captured and controlled) for each of the emissions units);
  - g. the total number of hours the facility was in operation;
  - h. the hourly VOC emissions, in lbs/hr, calculated by dividing the value in (e) by the value in (g) above (i.e.,  $h = e/g$ );
  - i. the average emissions unit hourly particulate emissions rate, in lbs/hr, calculated by dividing the value in (f) by the value in (g) above (i.e.,  $i = f/g$ ) (this value is then divided by 4, resulting in the hourly particulate emissions rate, for each of the four emissions units);
  - j. during the first 12 calendar months of operation, following the issuance of this permit, cumulative of monthly VOC emissions, in tons, for all calendar months back to the beginning of operations; and
  - k. after the first 12 calendar months of operation, following the issuance of this permit, summation of previous 12 calendar months of monthly VOC emissions, in TPY.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly, facility-wide VOC emissions rate exceeded the maximum allowable hourly, facility-wide VOC emissions rate of 10.2 lbs/hr.
2. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly average emissions unit particulate emissions rate exceeded the maximum allowable hourly average emissions unit particulate emissions rate of 0.551 lbs/hr.
3. The permittee shall submit deviation (excursion) reports identifying each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the facility-wide cumulative of monthly VOC emissions exceeded the maximum allowable facility-wide cumulative of monthly emissions of VOC as listed in Section A.2.c.
4. The permittee shall submit deviation (excursion) reports identifying each rolling, 12-month year, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide VOC emissions exceeded the maximum allowable annual facility-wide VOC emissions rate of 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.
5. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

## Emission Limitation:

0.551 lb/hr of particulate matter  
2.41 TPY of particulate matter

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements in Section C.1. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 5, 40 CFR Part 60, Appendix A.

## Emission Limitation:

10.2 lbs/hr of VOC

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in Section C.1. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 18, 40 CFR Part 60, Appendix A.

## Emission Limitation:

1% opacity as a 6-minute average, for stack emissions

## Applicable Compliance Method:

USEPA Method 9, 40 CFR Part 60, Appendix A

## Emission Limitation:

no visible particulate emissions from building ventilation

## Applicable Compliance Method:

USEPA Method 22, 40 CFR Part 60, Appendix A

## Emission Limitation:

maximum allowable facility-wide cumulative of monthly VOC emissions for the first 12 calendar months of operation following the issuance of this permit, as listed in Section A.2.c

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements in Section C.1.

## Emission Limitation:

The maximum allowable facility-wide annual VOC emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.

## Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements in Section C.1.

F. **Miscellaneous Requirements**

1. This permit allows the use of the coating-components, fillers, pre-paint cleaners, and other VOC-containing solvents/materials specified by the permittee in the application for PTI number 16-1740. In conjunction with the BAT requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on both the coating-component, filler, pre-paint cleaner, and other VOC-containing solvent/material facility-wide usage rates and formulation data and the design parameters of the emissions units' exhaust systems, as specified in the application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for facility-wide emissions of toluene based on the Screen3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the maximum acceptable ground-level concentration (MAGLC). The following summarizes the results of the modeling for toluene:

Pollutant: toluene (CAS 108-88-3)

TWA (ug/m3): 188,000

Maximum Hourly Emission Rate (lb/hr): 10.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2490

MAGLC (ug/m3): 4480

2. Any of the following changes may be deemed a "modification" to the emissions unit(s) and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency is required, including the possible issuance of modifications to PTI number 16-1740 and the operating permit:
  - any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or the use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold limit value, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;
  - any change to the emissions unit(s) or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
  - a reduction in the TWA by the ACGIH for any of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;

any change to the emissions unit(s) or its method of operation that would either require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;  
 any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and  
 any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in an increase in emissions of any "Hazardous Air Pollutants", as defined in OAC rule 3745-77-01(V).

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Facility ID: 1677050168 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint spray booth #2	OAC rule 3745-31-05 (PTI 16-1740)	no visible emissions from building ventilation  1% opacity as a 6-minute average  10.2 lbs/hr of volatile organic compounds (VOC) [facility-wide emissions]  9.9 TPY of VOC [facility-wide emissions]  See A.2.a below.
	OAC rule 3745-17-07	0.551 lb/hr of particulate matter 2.41 TPY of particulate matter
	OAC rule 3745-17-11	See A.2.b below.
	OAC rule 3745-21-09(U)	

**2. Additional Terms and Conditions**

- (a) The visible particulate emissions limit based on OAC rule 3745-17-07 is less stringent than the visible particulate emissions limit established pursuant to OAC rule 3745-31-05. This emissions unit shall only be operated to repaint (refinish) used motor vehicles and trailers. The maximum annual VOC emissions from the facility shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Maximum Allowable Facility-wide Cumulative Month(s) Emissions of VOC (Tons)
1 0.825
1-2 1.650
1-3 2.475
1-4 3.300
1-5 4.125

- 1-6 4.950
- 1-7 5.775
- 1-8 6.600
- 1-9 7.425
- 1-10 8.250
- 1-11 9.075
- 1-12 9.900

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

The permittee shall monitor monthly, facility-wide VOC emissions via monthly invoice records of all coating-components (i.e., resins, toners, reducers, hardeners, etc.), fillers, pre-paint prepping cleaners, and all other VOC-containing solvents/materials employed facility-wide (i.e., all above monthly invoiced materials are consumed each month).

**B. Operational Restrictions**

- 1. None

**C. Monitoring and/or Record Keeping Requirements**

- 1. The permittee shall maintain the following monthly, facility-wide (except where noted) records based on monthly, facility-wide invoice records:
  - a. the name and identification number of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed;
  - b. the VOC content of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed, in pounds of VOC per gallon of coating-component, filler, pre-paint cleaner, or any other VOC-containing solvent/material (manufacturer formulation data may be used, provided the VOC contents of all the above facility-invoiced materials have been determined, since January 1, 1991, in accordance with USEPA Method 24, 40 CFR Part 60, Appendix A, or similar approved test method);
  - c. the solids content of each solids-containing coating-component employed, in pounds of solids per gallon of coating-component (manufacturer formulation data may be used);
  - d. the number of gallons of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material;
  - e. the total VOC emissions contributed from all coating-components, fillers, pre-paint cleaners, and all other VOC-containing solvents/materials employed, in lbs/month (this value is calculated as follows: sum the multiplication products of the VOC content, in lbs/gal, times the monthly invoiced quantity, in gals/month, of each and every respective coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed);
  - f. the total particulate emissions contributed from all solids-containing coating-components employed, in lbs/month (this value is calculated as follows: sum the multiplication products of the solids content, in lbs/gal, times the monthly invoiced quantity, in gals/month, of each and every solids-containing coating-component employed and multiply this sum by 0.25, which is the solids transfer loss factor (solids not deposited on coating surface) for an HVLP application method (from STAPPA ALAPCO, 5/30/91); multiply this result by 0.1, which is the assumed overall particulates loss factor (particulates not captured and controlled) for each of the emissions units);
  - g. the total number of hours the facility was in operation;
  - h. the hourly VOC emissions, in lbs/hr, calculated by dividing the value in (e) by the value in (g) above (i.e.,  $h = e/g$ );
  - i. the average emissions unit hourly particulate emissions rate, in lbs/hr, calculated by dividing the value in (f) by the value in (g) above (i.e.,  $i = f/g$ ) (this value is then divided by 4, resulting in the hourly particulate emissions rate, for each of the four emissions units);
  - j. during the first 12 calendar months of operation, following the issuance of this permit, cumulative of monthly VOC emissions, in tons, for all calendar months back to the beginning of operations; and
  - k. after the first 12 calendar months of operation, following the issuance of this permit, summation of previous 12 calendar months of monthly VOC emissions, in TPY.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly, facility-wide VOC emissions rate exceeded the maximum allowable hourly, facility-wide VOC emissions rate of 10.2 lbs/hr.
- 2. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly average emissions unit particulate emissions rate exceeded the maximum allowable hourly average emissions unit particulate emissions rate of 0.551 lbs/hr.
- 3. The permittee shall submit deviation (excursion) reports identifying each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the facility-wide cumulative of monthly VOC emissions exceeded the maximum allowable facility-wide cumulative of monthly emissions of VOC as listed in Section A.2.c.
- 4. The permittee shall submit deviation (excursion) reports identifying each rolling, 12-month year, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide VOC emissions exceeded the maximum allowable annual facility-wide VOC emissions rate of 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.
- 5. The deviation reports shall be submitted in accordance with the requirements specified in General Term and

## Condition 3.

E. **Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
0.551 lb/hr of particulate matter  
2.41 TPY of particulate matter  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements in Section C.1. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 5, 40 CFR Part 60, Appendix A.  
Emission Limitation:  
  
10.2 lbs/hr of VOC  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in Section C.1. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 18, 40 CFR Part 60, Appendix A.  
Emission Limitation:  
  
1% opacity as a 6-minute average, for stack emissions  
  
Applicable Compliance Method:  
  
USEPA Method 9, 40 CFR Part 60, Appendix A  
Emission Limitation:  
  
no visible particulate emissions from building ventilation  
  
Applicable Compliance Method:  
  
USEPA Method 22, 40 CFR Part 60, Appendix A  
Emission Limitation:  
  
maximum allowable facility-wide cumulative of monthly VOC emissions for the first 12 calendar months of operation following the issuance of this permit, as listed in Section A.2.c  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements in Section C.1.  
Emission Limitation:  
  
The maximum allowable facility-wide annual VOC emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements in Section C.1.

F. **Miscellaneous Requirements**

1. This permit allows the use of the coating-components, fillers, pre-paint cleaners, and other VOC-containing solvents/materials specified by the permittee in the application for PTI number 16-1740. In conjunction with the BAT requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on both the coating-component, filler, pre-paint cleaner, and other VOC-containing solvent/material facility-wide usage rates and formulation data and the design parameters of the emissions units' exhaust systems, as specified in the application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for facility-wide emissions of toluene based on the Screen3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the maximum acceptable ground-level concentration (MAGLC). The following summarizes the results of the modeling for toluene:  
  
Pollutant: toluene (CAS 108-88-3)  
  
TWA (ug/m3): 188,000  
Maximum Hourly Emission Rate (lb/hr): 10.2  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2490  
MAGLC (ug/m3): 4480
2. Any of the following changes may be deemed a "modification" to the emissions unit(s) and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency is required, including the possible issuance of modifications to PTI number 16-1740 and the operating permit:  
any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or the use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold limit value, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;

any change to the emissions unit(s) or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;  
 a reduction in the TWA by the ACGIH for any of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;  
 any change to the emissions unit(s) or its method of operation that would either require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;  
 any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and  
 any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in an increase in emissions of any "Hazardous Air Pollutants", as defined in OAC rule 3745-77-01(V).

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Facility ID: 1677050168 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint preparation station #1	OAC rule 3745-31-05 (PTI 16-1740)	no visible emissions from building ventilation
		1% opacity as a 6-minute average
		10.2 lbs/hr of volatile organic compounds (VOC) [facility-wide emissions]
		9.9 TPY of VOC [facility-wide emissions]
		See A.2.a below.
	OAC rule 3745-17-07	0.551 lb/hr of particulate matter
	OAC rule 3745-17-11	2.41 TPY of particulate matter
		See A.2.b below.
	OAC rule 3745-21-09(U)	

**2. Additional Terms and Conditions**

- (a) The visible particulate emissions limit based on OAC rule 3745-17-07 is less stringent than the visible particulate emissions limit established pursuant to OAC rule 3745-31-05.  
 This emissions unit shall only be operated to repaint (refinish) used motor vehicles and trailers.  
 The maximum annual VOC emissions from the facility shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:
 

. Maximum Allowable
. Facility-wide Cumulative
Month(s) Emissions of VOC (Tons)

1 0.825  
 1-2 1.650  
 1-3 2.475  
 1-4 3.300  
 1-5 4.125  
 1-6 4.950  
 1-7 5.775  
 1-8 6.600  
 1-9 7.425  
 1-10 8.250  
 1-11 9.075  
 1-12 9.900

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

The permittee shall monitor monthly, facility-wide VOC emissions via monthly invoice records of all coating-components (i.e., resins, toners, reducers, hardeners, etc.), fillers, pre-paint prepping cleaners, and all other VOC-containing solvents/materials employed facility-wide (i.e., all above monthly invoiced materials are consumed each month).

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain the following monthly, facility-wide (except where noted) records based on monthly, facility-wide invoice records:
- the name and identification number of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed;
  - the VOC content of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed, in pounds of VOC per gallon of coating-component, filler, pre-paint cleaner, or any other VOC-containing solvent/material (manufacturer formulation data may be used, provided the VOC contents of all the above facility-invoiced materials have been determined, since January 1, 1991, in accordance with USEPA Method 24, 40 CFR Part 60, Appendix A, or similar approved test method);
  - the solids content of each solids-containing coating-component employed, in pounds of solids per gallon of coating-component (manufacturer formulation data may be used);
  - the number of gallons of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material;
  - the total VOC emissions contributed from all coating-components, fillers, pre-paint cleaners, and all other VOC-containing solvents/materials employed, in lbs/month (this value is calculated as follows: sum the multiplication products of the VOC content, in lbs/gal, times the monthly invoiced quantity, in gals/month, of each and every respective coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed);
  - the total particulate emissions contributed from all solids-containing coating-components employed, in lbs/month (this value is calculated as follows: sum the multiplication products of the solids content, in lbs/gal, times the monthly invoiced quantity, in gals/month, of each and every solids-containing coating-component employed and multiply this sum by 0.25, which is the solids transfer loss factor (solids not deposited on coating surface) for an HVLP application method (from STAPPA ALAPCO, 5/30/91); multiply this result by 0.1, which is the assumed overall particulates loss factor (particulates not captured and controlled) for each of the emissions units);
  - the total number of hours the facility was in operation;
  - the hourly VOC emissions, in lbs/hr, calculated by dividing the value in (e) by the value in (g) above (i.e.,  $h = e/g$ );
  - the average emissions unit hourly particulate emissions rate, in lbs/hr, calculated by dividing the value in (f) by the value in (g) above (i.e.,  $i = f/g$ ) (this value is then divided by 4, resulting in the hourly particulate emissions rate, for each of the four emissions units);
  - during the first 12 calendar months of operation, following the issuance of this permit, cumulative of monthly VOC emissions, in tons, for all calendar months back to the beginning of operations; and
  - after the first 12 calendar months of operation, following the issuance of this permit, summation of previous 12 calendar months of monthly VOC emissions, in TPY.

**D. Reporting Requirements**

- The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly, facility-wide VOC emissions rate exceeded the maximum allowable hourly, facility-wide VOC emissions rate of 10.2 lbs/hr.
- The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly average emissions unit particulate emissions rate exceeded the maximum allowable hourly average emissions unit particulate emissions rate of 0.551 lbs/hr.
- The permittee shall submit deviation (excursion) reports identifying each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the facility-wide cumulative of monthly VOC emissions exceeded the maximum allowable facility-wide cumulative of monthly emissions of VOC as listed in Section A.2.c.

4. The permittee shall submit deviation (excursion) reports identifying each rolling, 12-month year, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide VOC emissions exceeded the maximum allowable annual facility-wide VOC emissions rate of 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.
5. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
0.551 lb/hr of particulate matter  
2.41 TPY of particulate matter  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements in Section C.1. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 5, 40 CFR Part 60, Appendix A.  
Emission Limitation:  
  
10.2 lbs/hr of VOC  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in Section C.1. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 18, 40 CFR Part 60, Appendix A.  
Emission Limitation:  
  
1% opacity as a 6-minute average, for stack emissions  
  
Applicable Compliance Method:  
  
USEPA Method 9, 40 CFR Part 60, Appendix A  
Emission Limitation:  
  
no visible particulate emissions from building ventilation  
  
Applicable Compliance Method:  
  
USEPA Method 22, 40 CFR Part 60, Appendix A  
Emission Limitation:  
  
maximum allowable facility-wide cumulative of monthly VOC emissions for the first 12 calendar months of operation following the issuance of this permit, as listed in Section A.2.c  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements in Section C.1.  
Emission Limitation:  
  
The maximum allowable facility-wide annual VOC emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements in Section C.1.

**F. Miscellaneous Requirements**

1. This permit allows the use of the coating-components, fillers, pre-paint cleaners, and other VOC-containing solvents/materials specified by the permittee in the application for PTI number 16-1740. In conjunction with the BAT requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on both the coating-component, filler, pre-paint cleaner, and other VOC-containing solvent/material facility-wide usage rates and formulation data and the design parameters of the emissions units' exhaust systems, as specified in the application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for facility-wide emissions of toluene based on the Screen3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the maximum acceptable ground-level concentration (MAGLC). The following summarizes the results of the modeling for toluene:  
  
Pollutant: toluene (CAS 108-88-3)  
  
TWA (ug/m3): 188,000  
Maximum Hourly Emission Rate (lb/hr): 10.2  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2490  
MAGLC (ug/m3): 4480
2. Any of the following changes may be deemed a "modification" to the emissions unit(s) and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency is required, including the possible issuance of modifications to PTI number 16-1740 and the operating permit:  
any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-

containing solvents/materials, or the use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold limit value, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;

any change to the emissions unit(s) or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;

a reduction in the TWA by the ACGIH for any of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;

any change to the emissions unit(s) or its method of operation that would either require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;

any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and

any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in an increase in emissions of any "Hazardous Air Pollutants", as defined in OAC rule 3745-77-01(V).

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677050168 Emissions Unit ID: K004 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Paint preparation station #2	OAC rule 3745-31-05 (PTI 16-1740)	no visible emissions from building ventilation
		1% opacity as a 6-minute average
		10.2 lbs/hr of volatile organic compounds (VOC) [facility-wide emissions]
		9.9 TPY of VOC [facility-wide emissions]
		See A.2.a below.
	OAC rule 3745-17-07	0.551 lb/hr of particulate matter 2.41 TPY of particulate matter
	OAC rule 3745-17-11	See A.2.b below.
	OAC rule 3745-21-09(U)	

**2. Additional Terms and Conditions**

- (a) The visible particulate emissions limit based on OAC rule 3745-17-07 is less stringent than the visible particulate emissions limit established pursuant to OAC rule 3745-31-05.  
This emissions unit shall only be operated to repaint (refinish) used motor vehicles and trailers.  
The maximum annual VOC emissions from the facility shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission

levels specified in the following table:

. Maximum Allowable  
. Facility-wide Cumulative  
Month(s) Emissions of VOC (Tons)

1 0.825  
1-2 1.650  
1-3 2.475  
1-4 3.300  
1-5 4.125  
1-6 4.950  
1-7 5.775  
1-8 6.600  
1-9 7.425  
1-10 8.250  
1-11 9.075  
1-12 9.900

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual facility-wide emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

The permittee shall monitor monthly, facility-wide VOC emissions via monthly invoice records of all coating-components (i.e., resins, toners, reducers, hardeners, etc.), fillers, pre-paint prepping cleaners, and all other VOC-containing solvents/materials employed facility-wide (i.e., all above monthly invoiced materials are consumed each month).

**B. Operational Restrictions**

1. None

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain the following monthly, facility-wide (except where noted) records based on monthly, facility-wide invoice records:

a. the name and identification number of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed;

b. the VOC content of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed, in pounds of VOC per gallon of coating-component, filler, pre-paint cleaner, or any other VOC-containing solvent/material (manufacturer formulation data may be used, provided the VOC contents of all the above facility-invoiced materials have been determined, since January 1, 1991, in accordance with USEPA Method 24, 40 CFR Part 60, Appendix A, or similar approved test method);

c. the solids content of each solids-containing coating-component employed, in pounds of solids per gallon of coating-component (manufacturer formulation data may be used);

d. the number of gallons of each coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material;

e. the total VOC emissions contributed from all coating-components, fillers, pre-paint cleaners, and all other VOC-containing solvents/materials employed, in lbs/month (this value is calculated as follows: sum the multiplication products of the VOC content, in lbs/gal, times the monthly invoiced quantity, in gals/month, of each and every respective coating-component, filler, pre-paint cleaner, and any other VOC-containing solvent/material employed);

f. the total particulate emissions contributed from all solids-containing coating-components employed, in lbs/month (this value is calculated as follows: sum the multiplication products of the solids content, in lbs/gal, times the monthly invoiced quantity, in gals/month, of each and every solids-containing coating-component employed and multiply this sum by 0.25, which is the solids transfer loss factor (solids not deposited on coating surface) for an HVLP application method (from STAPPA ALAPCO, 5/30/91); multiply this result by 0.1, which is the assumed overall particulates loss factor (particulates not captured and controlled) for each of the emissions units);

g. the total number of hours the facility was in operation;

h. the hourly VOC emissions, in lbs/hr, calculated by dividing the value in (e) by the value in (g) above (i.e.,  $h = e/g$ );

i. the average emissions unit hourly particulate emissions rate, in lbs/hr, calculated by dividing the value in (f) by the value in (g) above (i.e.,  $i = f/g$ ) (this value is then divided by 4, resulting in the hourly particulate emissions rate, for each of the four emissions units);

j. during the first 12 calendar months of operation, following the issuance of this permit, cumulative of monthly VOC emissions, in tons, for all calendar months back to the beginning of operations; and

k. after the first 12 calendar months of operation, following the issuance of this permit, summation of previous 12 calendar months of monthly VOC emissions, in TPY.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly, facility-wide VOC emissions rate exceeded the maximum allowable hourly, facility-wide VOC emissions rate of 10.2 lbs/hr.

2. The permittee shall submit deviation (excursion) reports identifying each calendar month during which the hourly average emissions unit particulate emissions rate exceeded the maximum allowable hourly average emissions unit particulate emissions rate of 0.551 lbs/hr.

3. The permittee shall submit deviation (excursion) reports identifying each calendar month of the first 12 calendar months of operation after the issuance of this permit, during which the facility-wide cumulative of monthly VOC emissions exceeded the maximum allowable facility-wide cumulative of monthly emissions of VOC as listed in Section A.2.c.
4. The permittee shall submit deviation (excursion) reports identifying each rolling, 12-month year, after the first 12 calendar months of operation following the issuance of this permit, during which the 12-month summation of facility-wide VOC emissions exceeded the maximum allowable annual facility-wide VOC emissions rate of 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.
5. The deviation reports shall be submitted in accordance with the requirements specified in General Term and Condition 3.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
  
0.551 lb/hr of particulate matter  
2.41 TPY of particulate matter  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limits based upon the record keeping requirements in Section C.1. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 5, 40 CFR Part 60, Appendix A.  
Emission Limitation:  
  
10.2 lbs/hr of VOC  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limit based upon the record keeping requirements in Section C.1. If required, the permittee shall demonstrate compliance by testing in accordance with USEPA Method 18, 40 CFR Part 60, Appendix A.  
Emission Limitation:  
  
1% opacity as a 6-minute average, for stack emissions  
  
Applicable Compliance Method:  
  
USEPA Method 9, 40 CFR Part 60, Appendix A  
Emission Limitation:  
  
no visible particulate emissions from building ventilation  
  
Applicable Compliance Method:  
  
USEPA Method 22, 40 CFR Part 60, Appendix A  
Emission Limitation:  
  
maximum allowable facility-wide cumulative of monthly VOC emissions for the first 12 calendar months of operation following the issuance of this permit, as listed in Section A.2.c  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements in Section C.1.  
Emission Limitation:  
  
The maximum allowable facility-wide annual VOC emissions after the first 12 calendar months of operation following the issuance of this permit, shall not exceed 9.9 TPY, based upon a rolling, 12-month summation of the monthly emissions.  
  
Applicable Compliance Method:  
  
The permittee shall demonstrate compliance with the above limit based upon the recordkeeping requirements in Section C.1.

**F. Miscellaneous Requirements**

1. This permit allows the use of the coating-components, fillers, pre-paint cleaners, and other VOC-containing solvents/materials specified by the permittee in the application for PTI number 16-1740. In conjunction with the BAT requirements of OAC rule 3745-31-05, pollutant ground-level concentrations were derived in accordance with the Ohio EPA's "Air Toxics Policy" ("A.T.P."), based on both the coating-component, filler, pre-paint cleaner, and other VOC-containing solvent/material facility-wide usage rates and formulation data and the design parameters of the emissions units' exhaust systems, as specified in the application. Compliance with the Ohio EPA's "A.T.P." was demonstrated for facility-wide emissions of toluene based on the Screen3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the maximum acceptable ground-level concentration (MAGLC). The following summarizes the results of the modeling for toluene:  
  
Pollutant: toluene (CAS 108-88-3)  
  
TWA (ug/m3): 188,000  
Maximum Hourly Emission Rate (lb/hr): 10.2  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2490  
MAGLC (ug/m3): 4480

2. Any of the following changes may be deemed a "modification" to the emissions unit(s) and, as such, prior notification to and approval from the appropriate Ohio EPA District Office or local air agency is required, including the possible issuance of modifications to PTI number 16-1740 and the operating permit:
  - any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or the use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of a compound with a lower Time-Weighted Average (TWA) threshold limit value, as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)", than the lowest TWA value specified in the above table;
  - any change to the emissions unit(s) or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height) that would result in an exceedance of any MAGLC specified in the above table;
  - a reduction in the TWA by the ACGIH for any of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that at the maximum hourly emission rate specified in the above table, would result in an exceedance of the new MAGLC;
  - any change to the emissions unit(s) or its method of operation that would either require an increase in the emission limitation established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01;
  - any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in the emission of any of the exempted organic compounds included in the definition of "VOC" [OAC rule 3745-21-01(B)(6)]; and
  - any change in the composition of the coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, or use of new coating-components, fillers, pre-paint cleaners, or any other VOC-containing solvents/materials, that would result in an increase in emissions of any "Hazardous Air Pollutants", as defined in OAC rule 3745-77-01(V).